

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

)  
)  
)  
)  
)  
)  
)  
)

**MDL No. 2492**

**Master Docket No. 1:13-cv-09116**

**Judge John Z. Lee**

**Magistrate Judge M. David Weisman**

**DECLARATION OF RACHEL CHRISTMAN  
REGARDING UPDATED NOTICE PROGRAM EXPENSES**

I, Rachel Christman, hereby declare and state as follows:

1. I am employed as Senior Project Manager by Gilardi & Co. LLC (“Gilardi”), a KCC Class Action Services company. Gilardi has been retained to administer the Notice Program in this matter.

2. I submit this declaration in support of Gilardi Invoice US\_GIHL1630963, attached hereto as Exhibit A. This invoice addresses direct notice and administration costs from June 1, 2017 through January 31, 2019. These costs total \$882,274.56 (\$866,503.71 in administrative costs and expenses plus \$15,770.85 in sales tax) and, except where the scope of work exceeded initial projections as further outlined below, have been discounted to match or are currently in line with the costs addressed in the Second Declaration of Rachel Christman Regarding Notice Program Expenses, filed March 3, 2017 (“March 2017 Declaration”) (Dkt. #365-1). The total amount discounted, as detailed below, is \$104,398.25. Prior to this discount, the total amount for Gilardi Invoice US\_GIHL1630963 was \$970,901.96.

3. Invoice US\_GIHL1630963 includes (i) \$822,653.91 in costs addressed in the March 2017 Declaration, (ii) \$15,200.00 in additional costs presented to the Court in the Parties’ Joint Motion for an Extension of Time, filed March 7, 2017 (“Motion for Extension”) (Dkt.

#366), and (iii) \$28,649.80 in costs for (a) outreach to Frostburg State University Settlement Class Members (“Frostburg”) pursuant to the Court’s November 13, 2017 Order (Dkt. #481), (b) Residual Settlement Class Members (“Residual”) pursuant to the Court’s March 9, 2018 Minute Entry (Dkt. #498), and (c) Remaining Class Members (“Remaining”) pursuant to the Court’s September 17, 2018 Amended Order (Dkt. #527).

4. On March 7, 2017, the Court approved a budget of \$2,135,380.21 for administration expenses in this matter. (Dkt. #368). After including \$14,291.26 in sales tax from Invoice US\_GILH1245150 (which has already been approved and paid), this amount is \$2,149,671.47. The Motion for Extension proposed an additional \$15,200.00 in expenses related to the provision of direct notice, bringing the total budget to \$2,164,871.47 after sales tax. Should the Court approve payment of Gilardi Invoice US\_GIHL1630963 as outlined below, the total amount billed and paid will equal \$2,264,558.15 (\$2,234,496.04 in administrative costs and expenses plus \$30,062.11 in sales tax). The pre-tax amount of \$2,234,496.04 is \$83,915.83 more than the budget approved by the Court, an overage of 3.9%.<sup>1</sup> This overage is due to higher than anticipated volume of both Class Members’<sup>2</sup> usable contact information and Class Member correspondence.

---

<sup>1</sup> Such approved amount being \$2,150,580.21: \$2,135,380.21 (March 7, 2017 approved amount) + \$15,200 (Motion for Extension amount).

<sup>2</sup> As used in this paragraph, “usable contact information” encompasses both the initial email and mailing addresses provided by NCAA member institutions (Gilardi ultimately sent approximately 6% more postcards and 16% more emails than anticipated, resulting in higher postage costs as well as higher Returned Undeliverable Mail (“RUM”) rates) as well as updated mailing addresses provided by the USPS or located during the RUM Search process.

5. It is anticipated that Gilardi will ultimately need to bill an additional \$12,861.35<sup>3</sup> through completion.<sup>4</sup> If approved, this would result in a total administrative cost of \$2,277,419.50 (\$2,247,357.39 in administrative costs and expenses plus \$30,062.11 in sales tax). The pre-tax amount of \$2,247,357.39 is \$96,777.18 more than the budget approved by the Court, an overage of 4.5%.<sup>5</sup>

6. Certain costs addressed below have been discounted for the reasons described in the Final Declaration of Rachel Christman Regarding the Dissemination of Direct Notice, executed December 19, 2018 (Dkt #530) (“Christman Notice Declaration”), requiring additional mailings and email blasts to take place on November 14, 2017 (the Frostburg outreach), March 23, 2018 (the Residual outreach), and September 28, 2018 (the Remaining outreach). In addition, necessary costs associated with the extension of the Court timeline such as website and toll-free line hosting, additional statistical reporting, updates to the website and phone line, and certain administrative hours necessary to maintain the case during the extended time-frame were discounted. Additionally, the Data Audit ordered by the Court on February 6, 2018 (Dkt. #494), Exclusions Audit (that Gilardi subsequently performed at the request of the Parties), and costs associated with facilitating the external audit performed by Monument Economics Group have

---

<sup>3</sup> This amount includes project management (discussed in Paragraph 7.r below), handling of Class Member telephone Correspondence (Paragraph 7.t) and telephone calls (Paragraph 7.x), and mailing of Notice Requests to Class Members (Paragraph 7.y).

<sup>4</sup> Gilardi’s work in the current phase of this case is anticipated to be complete upon transfer of the NCAA Class Member data, Settlement Website and Toll Free Number to Garretson after the Effective Date. Costs related to the four (4) reminder mailings addressed in Section XI.A.3 of the Second Amended Class Action Settlement Agreement and Release are neither addressed in this declaration, nor were they addressed in the March 2017 Declaration. Such costs will be addressed at the time of each reminder mailing.

<sup>5</sup> Such approved amount being \$2,150,580.21: \$2,135,380.21 (March 7, 2017 approved amount) + \$15,200 (Motion for Extension amount).

been discounted. Costs incurred by Gilardi for the actual printing and mailing (including postage) of notice postcards, scanning, searching, and re-mailing RUM associated with the Frostburg, Residual, and Remaining mailings, as well as sending the email blast and handling Class Member correspondence have not been discounted as they were contemplated in the March 2017 Declaration. The costs for which Gilardi is seeking reimbursement are set forth below, along with explanations of any discounts that have been applied.

7. **Costs Addressed in the March 2017 Declaration (\$822,653.91)**

a. Case Management System Maintenance (\$1,218.75). This was addressed in Paragraph 13.a of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$1,893.75. Gilardi previously billed and was paid \$675.00 in this category, leaving \$1,218.75 in budgeted costs through completion of the case. Gilardi has incurred billing costs of \$5,383.00. This invoice includes a discount of \$4,164.25 to reach the budgeted cost. There will be no further billing in this category.

b. Document Formatting (\$0.00). This was addressed in Paragraph 13.b of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$51.25. Gilardi previously billed and was paid \$75.00 in this category, which exceeded the projected amount by \$23.75. Gilardi has incurred additional billing costs of \$1,591.00. This invoice includes a discount of \$1,591.00 to reach the budgeted cost. There will be no further billing in this category.

c. Staff Hours Processing Data Files (\$23,959.00). This was addressed in Paragraph 13.d of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$14,860. Gilardi previously billed and was paid \$3,600 in this category, leaving \$11,260 in the projected budget. Gilardi has incurred additional billing

costs of \$23,959.00. This amount has not been discounted as these hours do not relate to any of the data audits of the Notice Program (such hours being segregated and addressed in Paragraph 9 below), but reflect the actual time necessary to collect, process, standardize and consolidate the nearly 1,500 individual files from NCAA Member Institutions. There will be no further billing in this category.

d. Second and Third Round Email Notice (\$18,936.31). This was addressed in Paragraph 12.a of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$14,449.58. When combined with the \$1,033.64 in costs incurred for the Frostburg, Residual, and Remaining Email Notice (described in Paragraph 8.a below), Gilardi is over budget in this category by \$5,520.38 as the NCAA member institutions provided more usable email addresses than anticipated. There will be no further billing in this category as the budget for this category has been exhausted.

e. Second and Third Round Email Notice – Email Campaign Management (\$175.00). This was addressed in Paragraph 12.b of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$450.00. Gilardi previously billed and was paid \$275.00 in this category, leaving \$175.00 in budgeted costs through completion of the case. Gilardi has incurred billing costs of \$1,767.00. This invoice includes a discount of \$1,592.00 to reach the budgeted cost. There will be no further billing in this category.

f. Second and Third Round Email Notice – Track Email Bouncebacks (\$250.00). This was addressed in Paragraph 12.c of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$250.00. Gilardi has

incurred billing costs of \$375.00. This invoice includes a discount of \$125.00 to reach the budgeted cost. There will be no further billing in this category.

g. Second Round National Change of Address (“NCOA”) Update (\$1,691.00). This was addressed in Paragraphs 9.d and 12.d of the March 2017 Declaration, wherein Gilardi projected total costs in the amount of \$5,153.00. Gilardi previously billed and was paid \$3,462.00 in this category, leaving \$1,691.00 in the projected budget. Gilardi has incurred billing costs of \$1,691.00, and will not bill any further in this category.

h. Third and Subsequent Round Postcard Mailings – Print Costs (\$56,948.92). This was addressed in Paragraph 12.e of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$52,551.07. Gilardi previously billed and was paid \$137.20 in this category, leaving \$52,413.87 in the projected budget. When combined with the \$2,722.72 in costs incurred for the Frostburg, Residual, and Remaining Postcard Mailings (described in Paragraph 8.d below), Gilardi is over budget in this category by \$7,257.78 as the NCAA member institutions provided more usable mailing addresses than anticipated. There will be no further billing in this category.

i. Third and Subsequent Round Postcard Mailings – Postage Costs (\$520,675.84). This was addressed in Paragraph 12.g of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$480,466.88. Gilardi previously billed and was paid \$1,254.40 in this category, leaving \$479,212.48 in the projected budget. When combined with the \$24,893.44 in costs incurred for the Frostburg, Residual, and Remaining postcard postage (described in Paragraph 8.e below), Gilardi is over budget in

this category by \$66,356.80 as the NCAA institutions provided more usable mailing addresses than anticipated. There will be no further billing in this category.

j. Third and Subsequent Round Postcard Mailings – Print Production (\$600.00). This was addressed in Paragraph 12.f of the March 2017 Declaration, wherein Gilardi projected total costs in the amount of \$800.00. Gilardi previously billed and was paid \$200.00 in this category, leaving \$600.00 in the projected budget. Gilardi has incurred billing costs of \$1,150.00. This invoice includes a discount of \$550.00 to reach the budgeted cost. There will be no further billing in this category.

k. RUM Searches (\$52,894.00). This was addressed in Paragraph 12.i of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$74,005.00. After taking into account the cost of \$52,894.00 addressed herein, Gilardi is currently under-budget in this category by \$21,111.10. There will be no further billing in this category.<sup>6</sup>

l. RUM Remails – Print Costs (\$16,008.32). This was addressed in Paragraph 12.j of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$14,616.03. Gilardi is over budget in this category by \$1,392.30 as the RUM Searches on average produced 7% higher than standard results,<sup>7</sup> causing Gilardi to re-mail more pieces than anticipated. There will be no further billing in this category.

m. RUM Remails – Postage Costs (\$68,896.58). This was addressed in Paragraph 12.k of the March 2017 Declaration, wherein Gilardi projected costs in the

---

<sup>6</sup> This invoice includes a credit of \$4,373.40 for RUM Scanning, as Gilardi's earlier Invoice GILH1245069, inadvertently over-charged for RUM Scanned.

<sup>7</sup> The March 2017 Declaration assumed a standard 50% return rate for searched addresses. On average, the RUM searches in this matter had a return rate of 57%.

amount of \$62,904.42. Gilardi is over budget in this category by \$5,992.16 due to the higher than anticipated return on RUM searches addressed above. There will be no further billing in this category.

n. Staff Hours Performing RUM & Remail Services (\$1,168.00).

This was addressed in Paragraph 12.l of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$2,000.00. Gilardi previously billed and was paid \$832.00 in this category, leaving \$1,168 in the projected budget. Gilardi has incurred billing costs of \$10,152.00. This invoice includes a discount of \$8,984.00 to reach the budgeted cost. There will be no further billing in this category.

o. Website Maintenance: Two Websites (\$2,125.00). This was

addressed in Paragraph 13.f of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$2,500.00. Gilardi previously billed and was paid \$375.00 in this category, leaving \$2,125.00 in the projected budget. Gilardi has incurred billing costs of \$2,375.00. This invoice includes a discount of \$250.00 to reach the budgeted cost. There will be no further billing in this category.

p. Server Space Rental: Settlement Website (\$50.00). This was

addressed in Paragraph 13.g of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$250.00. Gilardi previously billed and was paid \$200.00 in this category, leaving \$50.00 in the projected budget. Gilardi has incurred billing costs of \$1,000.00. This invoice includes a discount of \$950.00 to reach the budgeted cost. There will be no further billing in this category.

q. Server Space Rental: NCAA Upload Site (\$150.00). This was

addressed in Paragraph 13.h of the March 2017 Declaration, wherein Gilardi projected



costs in the amount of \$200.00. When combined with the \$200 which Gilardi previously billed and was paid, Gilardi is over budget in this category by \$150 due to extensions of the timeline for this case to accommodate NCAA Institutions.<sup>8</sup> There will be no further billing in this category as the NCAA Upload Site has been deactivated.

r. Project Management (\$15,750.00). This was addressed in Paragraph 13.c of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$59,900.00. Gilardi previously billed and was paid \$7,175.00 in this category, leaving \$52,725.00 in the projected budget. Gilardi is currently under-budget in this category by \$36,975.00, of which we anticipate further billing in the amount of \$10,000.

s. Opt-Out/Objection Processing (\$3,500.00). This was addressed in Paragraph 13.i of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$3,250.00. Gilardi previously billed and was paid \$2,325.00 in this category, leaving \$925.00 in the projected budget. Gilardi has incurred additional billing costs of \$3,500.00. This amount exceeded the estimate provided in the March 2017 Declaration because Gilardi received a greater number of requests for exclusion than anticipated. There will be no further billing in this category.

t. Correspondence Processing (\$6,431.00). This was addressed in Paragraph 13.j of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$2,883.00. Gilardi previously billed and was paid \$75.00 in this category, leaving \$2,808 in the projected budget. Gilardi has incurred additional billing costs of

---

<sup>8</sup> The projected costs of \$200.00 assumed the NCAA Upload Site would be deactivated by the end of May 2017. Due to certain institutions not uploading the requested data within the originally requested time-frame, the NCAA Upload site remained active through the month of August 2017, resulting in \$150.00 (\$50.00 per month) in additional costs in this category. This site was deactivated in August 2017.

\$6,431.00, which have not been discounted as this reflects the actual time necessary to process and respond to the higher than expected volume of both emailed and mailed correspondence from Class Members. Gilardi anticipates an additional \$500.00 will be necessary to respond to future Class Member inquiries through the Effective Date.

u. Weekly Statistics Reporting (\$800.00). This was addressed in Paragraph 13.k of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$1,250.00. Gilardi previously billed and was paid \$450.00 in this category, leaving \$800.00 in the projected budget. Gilardi has incurred billing costs of \$4,125.00. This invoice includes a discount of \$3,325.00 to reach the budgeted cost. There will be no further billing in this category.

v. Declarations (\$825.00). This was addressed in Paragraph 13.l of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$2,500.00. Gilardi previously billed and was paid \$1,675.00 in this category, leaving \$825 in the projected budget. Gilardi has incurred billing costs of \$6,975.00 due to multiple additional declarations necessary to address the notice errors discussed herein, which have been discounted by \$6,150.00 to reach the budgeted cost. There will be no further billing in this category.

w. Telephone Support: Ongoing Script Management (\$600.00). This was addressed in Paragraph 13.m of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$750.00. Gilardi previously billed and was paid \$150.00 in this category, leaving \$600.00 in the projected budget. Gilardi has incurred billing costs of \$850.00. This invoice includes a discount of \$250.00 to reach the budgeted cost. There will be no further billing in this category.

x. IVR Line Charges (\$9,461.07), IVR Transfer Fee (\$2,690.95), & Staff Hours Providing Phone Support (\$20,055.92): (\$32,207.94 in total). These categories were addressed in Paragraph 13.n of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$7,935.01. When combined with the \$17,835.50 which Gilardi previously billed and was paid, Gilardi is over budget in this category by \$42,108.43 due to the higher than anticipated call volume in this case.<sup>9</sup> Based on current call trends, Gilardi anticipates billing for an additional 1,000 IVR minutes, with 600 minutes of live operator time, resulting in an additional \$180.00 in IVR Line Charges, \$108.00 in IVR Transfer Fees, and \$750.00 in Staff Hours Providing Phone Support. When combined with the \$32,207.94 above, this represents a total anticipated amount of \$43,146.43 over budget in this category through completion of the case.

y. Long Form Notice Requests – Print Costs (\$502.50), Postage Costs (\$164.15), & Print Production Management (\$500.00): (\$1,166.65 in total). These categories were addressed in Paragraph 13.o of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$2,490.00. Gilardi has incurred a billing cost of \$1,664.00 in Print Production Management, which has been discounted by \$1,164.00 to show a billed amount of \$500.00 to remain consistent with the budget. Gilardi is under-budget for both Print and Postage costs by a total amount of \$1,323.35 and will not bill beyond this remaining amount of budgeted costs.

8. **Additional Outreach to Frostburg (\$3,355.55), Residual (\$23,005.02), and Remaining (\$2,289.23) Class Members: (\$28,649.80 in total).** In accordance with the Court's

---

<sup>9</sup> The March 2017 Declaration assumed a total of 1,845 calls would be made to the IVR, and a total of 572 calls would be handled by live operators. As of January 31, 2019, however, there were 10,141 calls made to the IVR, and a total of 3,568 calls had been handled by live operators.

Order filed November 13, 2017 (Dkt. #481), the March 9, 2018 Notification of Docket Entry (Dkt. #498), and the September 17, 2018 Amended Order (Dkt. #527), Gilardi performed outreach to Frostburg, Residual, and Remaining Class Members, because such groups had not been included in Gilardi's three prior rounds of Notice outreach through mailed notice. As discussed in Paragraph 6 above, certain costs associated with this outreach have been discounted.

a. Email Notice: Frostburg (\$75.71); Residual (\$946.74); Remaining (\$11.19): (\$1,033.64 in total). The email notice to the Frostburg, Residual, and Remaining classes was billed at the same rate as the three prior rounds of email notice described above. When combined with the \$18,936.31 for Second and Third Round Email Notice addressed in Paragraph 7.d above, Gilardi is over budget in this category by \$5,520.38. As this overage is due to volume in excess of the originally anticipated amount, this cost has not been discounted.

b. Email Campaign Management (\$0.00). Gilardi incurred a billing cost of \$300.00 for Frostburg Email Campaign Management, \$650.00 for Residual Email Campaign Management, and \$300.00 for Remaining Email Campaign Management, all of which have been fully discounted.

c. NCOA Update (\$0.00). Gilardi incurred a billing cost of \$350.00 for the NCOA Update on the Frostburg mailing list, \$350.00 for the NCOA Update on the Residual mailing list, and \$350.00 for the NCOA Update on the Remaining mailing list, all of which have been fully discounted.

d. Postcard Mailings – Print Costs: Frostburg (\$323.37); Residual (\$2,174.76); Remaining (\$224.60): (\$2,722.72 in total). The postcard print costs for the Frostburg, Residual, and Remaining classes were billed at the same rate as the three prior

rounds of postcard printing described above. When combined with the \$56,948.92 for Third and Subsequent Round Postcard Mailings addressed in Paragraph 7.h above, Gilardi is over budget in this category by \$7,257.78. As this overage is due to volume in excess of the originally anticipated amount, this cost has not been discounted.

e. Postcard Mailings – Postage Costs: Frostburg (\$2,956.48); Residual (\$19,883.52); Remaining (\$2,053.44): (\$24,893.44 in total). The postage costs for the Frostburg, Residual and Remaining classes were billed at the same rate as the three prior rounds of postage described above. When combined with the \$520,675.84 addressed in Paragraph 7.i above for Third and Subsequent Round Postcard Mailings, Gilardi is over budget in this category by \$66,356.80. As this overage is due to volume in excess of the originally anticipated amount, this cost has not been discounted.

f. Print Production Management (\$0.00). Gilardi incurred a billing cost of \$225.00 for Frostburg Print Production Management, \$393.00 for Residual Print Production Management, and \$606.00 for Remaining Print Production Management, all of which have been fully discounted.

9. **Data and Exclusion Audits (\$0.00).** Gilardi has incurred a billing cost of \$62,804.00 to perform internal audits of data submissions by NCAA Member Institutions, and to coordinate with Monument Economics Group for the purpose of facilitating the external audit as ordered by the Court. Additionally, Gilardi has incurred a billing cost of \$8,975.00 to perform an audit of requests for exclusion submitted by Class Members. These amounts have been fully discounted.

10. **Costs Addressed in the Motion for Extension (\$15,200).** As outlined in the Motion for Extension, the Parties proposed notice to Settlement Class Members of the revised deadlines in the following ways:

a. The revised dates would be posted on the Settlement Website and would be included in the second round of direct notice. These efforts would cost an additional amount of approximately \$200.

b. The Notice Administrator would directly notify Settlement Class Members of the revised dates via email. This undertaking is expected to cost an additional amount of approximately \$15,000.

c. Class Counsel would issue a press release announcing the revised dates.

See Motion for Extension (Dkt. #366) ¶11. Upon receipt of the Court's May 23, 2017 Scheduling Order (Dkt. #411), and in accordance with the Court's March 7, 2017 Notification of Docket Entry (Dkt. #369), Counsel authorized Gilardi to notify Class Members of the revised timeline as described above. This email notice of the extended timeline took place on June 20, 2017.

11. Gilardi is requesting payment of Invoice US\_GIHL1630963 in the amount of \$882,274.56 as well as approval to pay final administration costs not to exceed \$12,861.35 once all Class Member information as well as control of the Settlement Website and the toll free phone line are transferred to the Program Administrator. If approved, this would result in an overall cost of \$2,277,419.50 for Settlement Administration (\$2,247,357.39 in administrative costs and expenses plus \$30,062.11 in sales tax). The pre-tax amount of \$2,247,357.39 is \$96,777.18 (4.5%) more than the budget previously approved by the court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 22<sup>nd</sup> day of July, 2019.

A handwritten signature in black ink that reads "Rachel Christman". The signature is written in a cursive style with a horizontal line underneath it.

Rachel Christman

# **EXHIBIT A**





3301 Kerner Blvd.  
San Rafael, CA 94901  
P: (415) 461-0410  
F: (415) 461-0412

July 21, 2019

Christopher A. O'Hara, Esq.  
Hagens Berman Sobol Shapiro LLP  
1918 8<sup>th</sup> Ave., Suite 3300  
Seattle, WA 98101

Re: **In Re NCAA Student Athlete Concussion Injury Litigation**  
Client Matter Number 4555  
Invoice: US\_GILH1630963

Professional services and third party expenses from June 1, 2017 through January 31, 2019 in connection with Intake and Process Data, Setup Case Management Systems, Document Formatting, Postcard Notice, RUM Processing, Website Development, Case Management, Opt-out & Objection Processing, Correspondence, Reporting, Declaration and Telephone Support for the **In Re NCAA Student Athlete Concussion Injury Litigation** matter.

Notification	Quantity	Unit	Rate	Amount	Client Courtesy Discount	Actual Amt After Discount
Case Management System Maintenance	53.83	hrs	\$100.00	\$ 5,383.00	<\$ 4,164.25>	\$ 1,218.75
Document Formatting	15.91	hrs	\$100.00	1,591.00	< 1,591.00>	0.00
Staff Hours Processing Data Files	239.59	hrs	\$100.00	23,959.00		23,959.00
Second & Third Round Email Notice	901,729	units	\$0.021	18,936.31		18,936.31
Second & Third Round Email Notice – Email						
Campaign Management	17.67	hrs	\$100.00	1,767.00	< 1,592.00>	175.00
Track/Manage Bouncebacks	3.75	hrs	\$100.00	375.00	< 125.00>	250.00
NCOA	1	units	\$1,619.00	1,691.00		1,691.00
Third & Subsequent Postcard Mailings – Print Cost	1,627,112	units	\$0.035	56,948.92		56,948.92
Third & Subsequent Postcard Mailings – Postage	1,627,112	units	\$0.32	520,675.84		520,675.84
Third & Subsequent Postcard Mailings – Print						
Production	11.50	hrs	\$100.00	1,150.00	< 550.00>	600.00
RUM Scanning	<43,734>	units	\$0.10	< 4,373.40>		< 4,373.40>
RUM Searches	264,470	units	\$0.20	52,894.00		52,894.00
RUM Remails	202,637	units	\$0.079	16,008.32		16,008.32
RUM Remails – Postage	202,637	units	\$0.34	68,896.58		68,896.58
Staff Hours Performing RUM & Remail Services	101.52	hrs	\$100.00	10,152.00	< 8,984.00>	1,168.00
Website Maintenance: Two Websites	23.75	hrs	\$100.00	2,375.00	< 250.00>	2,125.00
Server Space Rental: Settlement Website	20	mos	\$50.00	1,000.00	< 950.00>	50.00
Server Space Rental: NCAA Upload Site	3	mos	\$50.00	150.00		150.00
Project Management	157.50	hrs	\$100.00	15,750.00		15,750.00
Opt-out/Objection Processing	35.00	hrs	\$100.00	3,500.00		3,500.00
Correspondence Processing	64.31	hrs	\$100.00	6,431.00		6,431.00
Weekly Statistic Reporting	41.25	hrs	\$100.00	4,125.00	< 3,325.00>	800.00
Declarations	69.75	hrs	\$100.00	6,975.00	< 6,150.00>	825.00
Data Audit	628.04	hrs	\$100.00	62,804.00	<62,804.00>	0.00
Exclusion Audit	89.75	hrs	\$100.00	8,975.00	< 8,975.00>	0.00
<b>Subtotal Notification</b>						<b>\$788,679.32</b>

continued

